

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

<p>GILDA HAGAN-BROWN,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ELI LILLY AND COMPANY, an Indiana corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:14-cv-01614-AJT-JFA</p> <p>Hon. Anthony J. Trenga Hon. John F. Anderson</p>
<p>JANINE ALI,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ELI LILLY AND COMPANY, an Indiana corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:14cv-01615-AJT-JFA</p> <p>Hon. Anthony J. Trenga Hon. John F. Anderson</p>

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

For the reasons set forth in the accompanying memorandum of law which is incorporated by reference, Plaintiffs Gilda Hagan-Brown and Janine Ali herby move this Court for an order compelling Defendant Eli Lilly and Company ("Lilly") to produce documents responsive to Requests for Production Nos. 1, 2, and 3 of Plaintiffs' Second Set of Request for Production, served on Lilly on April 15, 2015. In support of this motion, the following documents are being filed concurrently with this motion:

1. Memorandum in Support of Plaintiff's Motion to Compel Production of Documents; and

2. Declaration of R. Brent Wisner in Support with its accompanying exhibits.

Dated: May 22, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Peter Miller, hereby certify that on the 22nd day of May, 2015, a true copy of the foregoing PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

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